Feedback Form

Long-Term RFP – July 21, 2022

Feedback Provided by:

Name: Julien Wu

Title: Director, Regulatory Affairs

Organization: Evolugen by Brookfield Renewable

Email:

Date: August 4, 2022

Following the July 21st public webinar on the Long-Term RFP, the Independent Electricity System Operator (IESO) is seeking feedback from participants on: Municipal Council Support Resolution, Contract Design, Revised Timelines, and the Deliverability Test Guidance Document.

The referenced presentation can be found on the Long-Term RFP webpage.

Please provide feedback by August 4, 2022 to engagement@ieso.ca.

Please use subject header: *Long-Term RFP* . To promote transparency, this feedback will be posted on the <u>Long-Term RFP webpage</u> unless otherwise requested by the sender.

The IESO will work to consider and incorporate comments as appropriate and post responses on the webpage.

Thank you for your contribution.



Municipal Council Support Resolution

| Торіс | Feedback |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| Please provide any feedback on the IESO's proposal to change the Municipal Council Support Resolution from a mandatory requirement to a rated criteria. | We support Council Support Resolution as a mandatory requirement to ensure early and informed consent for stakeholders. |

Proposed Contract Design

| Торіс | Feedback |
|----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Please provide any feedback on the potential use of indexing in the contracts and what indices (if any) may be best suited for these procurements. | We strongly support the use of indices in the contracts. To be clear, the IESO should include two separate indices: a first index to cover the period between contract award and COD; and a second index to cover the contract period itself. Without including these two indices, developers would price in this uncertainty in a non-uniform and non-transparent manner in their respective offers—which could complicate the IESO's offer evaluation process. Having the first index in place protects the IESO from developers walking away from projects due to extremely high price events; as well as help the IESO reduce offer prices in low price events. The first index should be linked to the costs of materials and shipping. We recommend the IESO select international indices such as the Shanghai Metal Market as reference. For the second index, we recommend the CPI to cover the period from COD to contract termination. |
| | |

LT1 RFP and Expedited Process: Revised Timelines

| Торіс | Feedback |
|-----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Please provide feedback on the proposed revised timelines and whether these seem appropriate. | With regards to the revised timelines: we recommend the IESO: a) proportionally push back its project COD expectation to allow developers more time, and in the same vein, b) adjust and delay the early delivery bonus accordingly. |

Deliverability Test Guidance Document

| Торіс | Feedback |
|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Please provide any feedback on the Deliverability Test Guidance Document and associated form. | While we understand that the IESO is inundated with RFQ offers, and as such might not be able to evaluate all three variations of the same project, we urge the IESO to still attempt to evaluate and score all three variations of projects beyond a certain scale, to ensure that the IESO does not inadvertently forego attractive projects whose first variation(s) cannot be awarded contract due to interconnection room limitations. |

General Comments/Feedback

With regards to storage specific contracts: we generally support the proposal from CanREA, and wish to highlight that a storage facility's "best" segment's window must match its obligation window, while accounting for seasonal variations and roundtrip efficiencies.